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October 17, 2012

**VIA ECF**

William T. Walsh, Clerk of the Court  
United States District Court  
M.L. King Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: John Telliho v. East Windsor Township, et al.  
Civil Action No. 3:12-cv-4800-PGS-LHG**

Dear Mr. Walsh:

We represent defendant, Township of Woodbridge ("Woodbridge"), in Townsend v. Woodbridge Township, American Traffic Solutions, Civil Action No. 2:12-cv-4995-WJM-MF and defendant, Township of Edison ("Edison"), in Vetere, et al. v. Edison Township, Redflex Traffic Systems, Inc., Civil Action No. 2:12-cv-4996-WJM-MF.

On September 18, 2012, American Traffic Solutions, Inc. ("ATS"), a defendant in the Woodbridge case, filed a motion to consolidate the following six cases in which it is a defendant:

- Telliho v. East Windsor Twp., et al., Civil Action No. 3:12-cv-4800-PGS-LHG;
- Townsend v. Woodbridge Twp., et al., Civil Action No. 2:12-cv-4995-WJM-MF;
- Conrow v. Monroe Twp., et al., Civil Action No. 1:12-cv-5005-JHR-JS;
- Fitting v. Bor. of Glassboro, et al., Civil Action No. 1:12-cv-5007-JHR-JS;
- O'Brien, et al. v. Brick Twp., et al., Civil Action No. 3:12-cv-5096-JAP-DEA; and
- Darocha v. City of Linden, et al., Civil Action No. 2:12-cv-5235-SDW-MCA

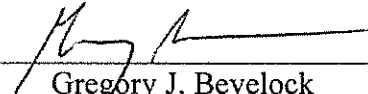
On September 21, 2012, Redflex Traffic Systems, Inc. ("Redflex"), a defendant in the Edison case, filed a motion to consolidate the following five cases in which it is a defendant with Telliho, supra.:

- Naumowski v. City of Newark, et al., Civil Action No. 2:12-cv-5119-WJM-MF;
- Marinaccio v. City of Newark, et al., Civil Action No. 2:12-cv-5141-FSH-PS;
- Naphys v. Bor. of Stratford, et al., Civil Action No. 1:12-cv-5164-JHR-JS;
- Spector, et al. v. Cherry Hill Twp. et al., Civil Action No. 1:12-cv-5198-JEI-JS; and
- Vetere, et al. v. Edison Twp., et al., Civil Action No. 2:12-cv-4996-WJM-MF



Accordingly, we are hereby filing the brief on behalf of Woodbridge and Edison in response to the above motions, along with the Declaration of Gregory J. Bevelock, Esq., in Telliho v. East Windsor Twp., et al., Civil Action No. 3:12-cv-4800-PGS-LHG, which is pending before the Hon. Peter G. Sheridan and is the first filed case. We are also filing copies of these papers in each of the other ten cases, and are providing courtesy copies to Judge Sheridan, and the Chief Judge, the Hon. Jerome B. Simandle.

Respectfully submitted,  
DeCOTIIS, FITZPATRICK & COLE, LLP

By:   
Gregory J. Bevelock

GJB:sh

Encl.

cc: Hon. Jerome B. Simandle, U.S.D.J. (via regular mail)  
Hon. Peter G. Sheridan, U.S.D.J. (via regular mail)  
All counsel of record (via ECF)